

February 8, 2019

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: Office of Engineering and Technology and Wireless Telecommunications Bureau Seek Comment on 5GAA Petition for Waiver to Allow Deployment of Cellular Vehicle-to-Everything (C-V2X) Technology in the 5.9 GHz Band, GN Docket No. 18-357**

Dear Ms. Dortch:

The Central Ohio Transit Authority (“COTA”) hereby submits its Comments in response to the Petition for Waiver submitted by the 5G-Automobile Association (“5GAA”) to the Federal Communications Commission (“FCC” or “Commission”) in GN Docket No. 18-357.<sup>1</sup>

COTA is the regional public transit provider for the Columbus, Ohio metropolitan area. COTA delivers transportation service to 1.2 million Ohioans, providing 19 million passenger trips annually. COTA oversees bus service for Franklin County and the rest of the central Ohio region, including Columbus, Bexley, Gahanna, Grandview Heights, Grove City, Hilliard, Reynoldsburg, Upper Arlington, Westerville, Whitehall, Dublin, and Worthington.

COTA’s success in providing public transportation services has received national attention as well, with the American Public Transportation Association recognizing COTA with the 2018 Outstanding Public Transportation System Achievement Award. COTA was recognized for its efficient operations, innovation, sustainability, and safety.

COTA is actively engaged with its partners Smart Columbus, TRC Inc. (TRC), The Ohio State University, Drive Ohio, and the Ohio Department of Transportation in providing multi-modal services to the citizens of central Ohio in the safest and most cost-effective manner.

Over the past few years central Ohio has tested and deployed connected vehicle technology, primarily Dedicated Short Range Communications (“DSRC”) in the 5.9 GHz band. TRC, the largest independent vehicle test facility in the United States, has been testing connected vehicle technology for over a decade. Columbus was awarded the U.S. Department of Transportation’s Smart City grant and is deploying nine advanced mobility technology projects, including a connected vehicle deployment of 1,500 – 1,800 vehicles. U.S. 33, a 34 mile corridor between Columbus and TRC, has been outfitted with connected vehicle technology and testing is

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<sup>1</sup> Petition for Waiver to Allow Deployment of Intelligent Transportation Cellular Vehicle to Everything (C-V2X) Technology, Petition for Waiver, GN Docket No. 18-357 (filed Nov. 21, 2018) (“5GAA Waiver Petition”).

on-going. Dublin, a suburb of Columbus has instrumented each of its 14 intersections with DSRC road side units.

COTA outfitted connected vehicle technology in the form of traffic signal prioritization along a new bus rapid transit corridor connecting job centers, healthcare and higher education to lower-income neighborhoods to spur revitalization and economic development. That investment has increased ridership along that corridor by 17 percent. COTA also intends to link connected vehicle initiatives through Smart Columbus and to its operating system to demonstrate improved capacity and safety on existing infrastructure by optimizing vehicle performance.

COTA is committed to vehicle safety. Each year, of the more than 1.2 million lives are lost to traffic crashes worldwide, roughly 40,000 of those are in the United States. And whether these collisions result in death or injury to drivers, passengers, or pedestrians, the vast majority of those collisions are the result of human error.

In 1999, the FCC set aside 75 MHz of spectrum in the 5.9 band for Intelligent Transport Systems (“ITS”) specifically for connected vehicles. It did so because of the promise that thousands of lives would be saved annually with this technology. We are finally on the cusp of wide-spread deployment and are now seeing increased deployment of connected vehicle (“CV”) technology at the state and local level, major manufacturers announcing their intention to adopt the technology, and a competing CV technology is seeking to utilize the 5.9 GHz spectrum. Now is not the time to open up the spectrum to non-transportation uses. **We urge the FCC to protect the entire 75 MHz of spectrum for ITS uses.**

COTA recognizes that technology will continue to evolve, and we intend to evolve with it. As such, we support technology neutrality. Nevertheless, it is critical that the FCC protect the current investment in DSRC technology and not impose unintended, unnecessary or duplicative costs on operating entities. As such, **we urge that if the FCC grants the 5GAA waiver, that it require that any technology being deployed on the 5.9 spectrum be interoperable.** Unless it does so, there is a very real possibility that we would be required to support competing technologies and that thousands of lives will be lost unnecessarily.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joanna Pinkerton', is written over a light gray rectangular background.

Joanna Pinkerton  
President and Chief Executive Officer  
Central Ohio Transit Authority